

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)
E911 Phase II Waiver Request Filed by)
CORR Wireless Communications, LLC) CC Docket No. 94-102

**Comments of Self Help for Hard of Hearing People (SHHH) On E911
Phase II Waiver Request Filed by CORR Wireless Communications,
LLC**

Self Help for Hard of Hearing People (SHHH) submits these comments in response to the request of the Wireless Telecommunications Board (WTB) for comment on a waiver request submitted by Corr Wireless Communications, LLC. On June 22, 2001, Corr Wireless Communications, LLC (Corr) filed a petition seeking a temporary waiver of the Commission's Phase II rules to allow the carrier to deploy its network solution on Corr's own graduated schedule.

SHHH is a national educational organization representing people with hearing loss. Its members are people of all ages and degrees of hearing loss. Through a national office, eight state associations and a network of 250 chapters and groups across the country, SHHH members consistently work towards increasing communication access to enable people with hearing loss to continue to function in mainstream society. Access to telecommunications is integral to being able to actively participate in today's world.

It is estimated that one in ten of the population has some degree of hearing loss. This number is on the increase as a result of the noise that we are exposed to and the aging of our society. The incidence is even higher for people over 65 years of age, of whom one in three has some degree of hearing loss. In the United States today approximately 6 million people use hearing aids and 20,000 people have cochlear implants.

SHHH supports actions that promote technology sector growth and innovations so long as the products that result from such advancement are available to the people in our population that have a hearing loss. SHHH is very concerned that granting an exception for a handset manufacturer will undermine the effort of the TTY Forum and the intent of the FCC Regulations. As a member of the TTY Forum, SHHH has participated in discussions identifying the technical issues associated with the regulation to which CORR seeks a waiver. The purpose of the TTY forum is to collectively embrace the challenges of making digital wireless technology accessible to people with hearing loss and to proactively identify industry solutions. This waiver request seeks to bypass the TTY Forum effort and has the potential to set a dangerous precedent just as the industry approaches another FCC deadline.

In this instance, the original report and order requiring compatibility with Enhanced 911 Emergency Calling Systems was issued in 1996.¹ If the interests and access of people with hearing loss to telecommunications are to be safeguarded, the FCC must regulate the provision of wireless 911 calls and ensure that they are offered in a manner consistent with that used for wire line calls.

For the foregoing reasons, SHHH strongly opposes any proposed waiver of the Commission's Phase II rules, which would delay the implementation of Phase II service by up to eighteen months, and would prevent Public Safety Answering Points from learning the precise location of wireless 911 calls.

Respectfully submitted,

A handwritten signature in cursive script that reads "Beth Wilson".

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¹ 47 C.F.R. §20.18. *See* Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Report and Order and further Notice of Proposed Rulemaking, 11 FCC Rcd 18676 (1996).